

**Topics the OSR has Identified for Clarification for Proposed Update Page
Changes in the RPP, Rev 5A**

1. Include in the RPP the positions of those key individuals responsible for implementing 10 CFR 835. Note: This may be addressed by reference to a specific document. The BNI response to question RPP5A-Q6 did not adequately address this matter. The reference to the QAP in response to RPP5A-Q32 was not adequate because the QAP does not describe the Radiation Protection Manager or the Radiation Protection Organization.
2. Revise RPP Requirement 44, Other Implementing Provisions column of the Appendix A, Reference 3, to include the Memorandum of Understanding presented in the BNI response to question RPP5A-Q10A. Also, the 100-day implementation schedule presented the BNI response to RPP5A-Q10B needs to agree with the schedule presented in the response to RPP Requirement 44 in Attachment 2 of Reference 1.
3. Revise the RPP to indicate the BNI commitment to document the “technical basis” when they are the foundation of compliance decisions. In the BNI response to RPP5A-Q15, Reference 1, BNI referred to a “technical equivalency document” rather than a “technical basis” document. The term “technical equivalency” is used in Section 6 of RPP, Revision 5A to describe the analysis and documentation of an alternate method to satisfy a commitment. The term “technical basis document” is used by DOE to document the professional judgment behind decisions like the selection of instrumentation, dosimetry, or specific steps in procedures. For example, a procedure may contain a hand-held instrument reading that is used to trigger the calculation of skin dose from contamination if a technical basis document is on file.
4. BNI's response to RPP5A-Q21 should result in a change to RPP5A Table 1 in Reference 3. Note: The Reference 1 response referred to “Article 1102 (a); the correct citation should have been 10 CFR 835.1102. In addition, the response stated, “Legacy contamination that is transported by an environmental or biological, is not enforceable under Article 1102 (a).” This sentence is not clear. If it is a direct quote from an authorized Department source, then the source should be included in your response.

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1. Include the reply to RPP5A-Q3 in the RPP.
2. State in the RPP that for the purpose of compliance with 10 CFR 835, BNI is committing to only those articles from the Tank Farm Radiological Control Manual (TFRCM), HNF-5183, in Appendix A to RPP5A. See the BNI response to question RPP5A-Q2A and D.
3. State in the RPP, that for the purpose of compliance with 10 CFR 835 BNI is not committing to implement the DOE Implementation Guides in Appendix A to RPP, Revision 5A. See the BNI response to question RPP5A-Q2B and C.
4. Include in the RPP the information on general program descriptions and schedules consistent with those presented in response to question RPP5A-Q4A, B, and C.
5. State in the RPP which commitments documented in the "Other Implementing Provisions" column of Appendix A apply to which RPP Requirements listed in Appendix A. See the BNI response question RPP5A-Q5.
6. Include in the RPP the information on the compliance status and committed actions from Reference 1, Attachment 2, the BNI reply to RPP5A-Q7 and include a statement when the "detailed schedule" mentioned in the BNI response will be completed.
7. Add the audit program described in your response to RPP5A-Q9A to the "Other Implementing Provisions" column of Appendix A, Reference 3, for Requirement 20.
8. Incorporate in the RPP, Revision 5A, the response to RPP5A-Q16, Reference 1, indicating that BNI will use the procurement process to assure subcontractor compliance with 10 CFR 835.
9. Include the response to RPP5A-Q18, Reference 1, in the proposed page changes to the RPP. This could occur at either the location in the RPP where the response to RPP5A-4, Reference 2, is incorporated or it could occur at the responses to RPP Requirements 51 and 52 in Appendix A of Reference 3.
10. The ISAR made a statement that work will occur on Tank 241-AP-106 during construction. In the response to our question (RPP5A-Q22) about whether this work was included in the scope of the RPP the Contractor stated, "Work involving tank 241-AP-106 is not within the scope of the RPP revision 5A." Include the response in the proposed RPP page changes.